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May 18, 2009

By Hand Delivery

EEO Staff, Policy Division
Media Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

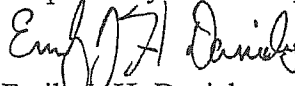
RECEIVED - FCC
MAY 18 2009
Federal Communications Commission
Bureau / Office

Re: Response to 2009 EEO Audit Inquiry
The Curators of the University of Missouri
KOMU-TV, Columbia, MO (FIN: 65583)

Dear Mr. Pulley,

The Curators of the University of Missouri ("Licensee"), licensee of KOMU-TV, Columbia, Missouri, hereby responds to the March 23, 2009 Letter (the "Letter") from Lewis C. Pulley, Assistant Chief, Policy Division, Media Bureau, Federal Communications Commission.¹

Should there be any questions regarding this matter, please contact the undersigned.

Respectfully submitted,

Emily J. H. Daniels

Enclosure
533375-0000008

¹ On May 4, 2009, the Licensee requested an extension of time, until May 18, 2009, to respond to the Letter. The extension request was granted via an e-mail from Lewis Pulley on May 6, 2009.

Response of The Curators of the University of Missouri to March 23, 2009 Letter

The Curators of the University of Missouri, the licensee of station KOMU-TV, Columbia, Missouri ("KOMU"), hereby timely responds to the March 23, 2009 letter from Lewis C. Pulley, Assistant Chief, Policy Division, Media Bureau, Federal Communications Commission.

Question 3(a)

The most recent two EEO Public File Reports are attached as Exhibit 1, and the dates of the hires listed therein are included as part of Exhibit 2. The station's website address is <http://www.komu.com>. The station's most recent EEO Public File Report may be found by going to that website and clicking on "FCC Public Information."

Question 3(b)

The responsive materials, as contained in the station's files, are attached as Exhibit 2. KOMU, along with the educational institution the University of Missouri, has a standard procedure for ensuring broad and inclusive outreach efforts for station and non-station job openings. First, every open external job position is posted to the University's job listing website. Because the University is the largest employer in the area, this job listing website is a well known community resource which receives a substantial number of viewings each day. In addition, an e-mail listing new jobs, including both station jobs and other University jobs, is circulated each week by the University's Human Resource Services Department to various community organizations. A list of these community organizations is included in the station's EEO reports at Exhibit 1 and in Exhibit 2. The station also periodically sends supplemental letters to other community organizations alerting them of job openings.

orientation, national origin, age, disability, and status as Vietnam era veteran.” Additionally, all job applicants are informed in writing as part of the University’s job application that “[t]he University of Missouri does not discriminate on the basis of race, color, religion, national origin, sex, sexual orientation, age, disability or status as a qualified protected veteran” and that “MU is an affirmative action/equal opportunity employer.” ADA accommodations and Spanish translation are also provided to assist with the job application process.

Each level of management is responsible for adhering to the EEO policy of the University. The President, the Chancellor of the University, and the Assistant Vice Chancellor of Human Resource Services has the responsibility for administering the program, assisting in the administration of the program on each campus. Administrative officers including Deans, Directors, Department Chairpersons, and other supervisory personnel, are responsible for the implementation of the program within their functional areas of responsibility. At the station, the station manager and other station personnel are responsible for ensuring compliance with the University’s EEO policy.

The University’s EEO program is distributed throughout the University and discussed at appropriate management and supervisory meetings. All faculty and staff are informed of the University’s Equal Opportunity Program through appropriate University and campus publications and communications such as the Human Resources policy Manual, the UM Collected Rules and Regulations, divisional and departmental meetings, and staff orientation programs. The University has a policy of furnishing copies of its nondiscrimination employment policy on an annual basis to community organizations, news media, area colleges, secondary schools, and recruiting sources.

Question 3(g)

Both KOMU and University of Missouri management periodically analyze the station's EEO program to ensure that the unit is obtaining a diverse group of applicants and is widely disseminating announcements of full-time job vacancies. The station keeps a list of all full-time vacancies each year, by job title, as well as a list of all organizations sent information on job vacancies. Furthermore, each year the FCC-required EEO Public File Report is created for and placed into the station's public file and posted to the station's website on the anniversary date of the filing of the station's license renewal application.

Question 3(h)

It is the policy of the station that employment decisions are based on such factors as merit, qualifications, competence, and the needs of the station. It is also the policy of the station that employment practices are not influenced or affected by virtue of the applicant's or employee's race, color, creed, religion, sex, national origin, age, disability, handicap, or any other characteristic protected by law.

The station has a policy of engaging in the following efforts to ensure that there is equal opportunity within employment practices and that there are no unlawful discriminatory effects:

- Formal performance reviews are conducted annually to provide all employees the opportunity to discuss job tasks, identify and correct weaknesses, encourage and recognize strengths, and discuss positive, purposeful approaches for meeting goals. At this time, all employees are reviewed for merit increases and pay adjustments, largely based on the percentage of the University's merit increase pool allocated to the station.
- The station follows an annual budget regimented by the University, and salary ranges are established by the University of Missouri System Human Resource Services. Applicants hired into positions are paid within the range of the position based on their relative education, training, skills, and experience.
- All employees are subject to a probation period of six months. This is an opportunity for new employees to become familiar with the company and their job.
- Departmental transfers and promotions are strongly encouraged. Therefore, both the station and the University employ a Direct Promotion Program to inform employees of

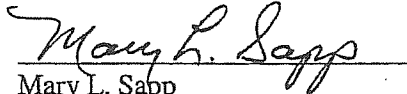
openings and to identify qualified and interested applicants who might not otherwise be known to the hiring manager.

With respect to union hires, the station complies with the union's policies. This policy is reviewed annually at Meet and Confer meetings with the union. At that time, either the University or the union may elect to request changes to the policy. These union policies, along with other information regarding the University's employment-related policies, are attached as Exhibit 4.

Question 3(i)

The station is not a religious broadcaster; accordingly, no response to this question is required.

Executed this 18th day of May 2009 under penalty of perjury.


Mary L. Sapp
Director of Business Services